

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Case No. 15-30125

The Archdiocese of Saint Paul and
Minneapolis,

Chapter 11

Debtor.

UNSWORN DECLARATION OF JEFFREY R. ANDERSON

1. The undersigned, Jeffrey R. Anderson, submits this Declaration in support of the motion (the "Motion") of the Official Committee of Unsecured Creditors (the "Committee") for substantive consolidation.

2. I am an attorney with the law firm of Jeff Anderson & Associates, P.A. representing Certain Personal Injury Creditors in the above-captioned bankruptcy case filed by The Archdiocese of Saint Paul and Minneapolis (the "Archdiocese").

3. Attached hereto as Exhibit 1 is a copy of a chart summarizing parish and other Catholic entity loans guaranteed by the Archdiocese.

4. Attached hereto as Exhibit 2 is a Summary Statement of Financial Position for the Catholic Finance Corporation dated June 30, 2008.

5. Attached hereto as Exhibit 3 is Archdiocesan Parish Financial Report Instruction Booklet for Fiscal Year Ended June 30, 2010.

6. Attached as Exhibit 4 is a chart of 2006 Archdiocesan parish finances.

7. Attached as Exhibit 4A are excerpts of the 2006 Archdiocesan parish finances.

8. Attached as Exhibit 5 is a chart of 2007 Archdiocesan parish finances.

9. Attached as Exhibit 5A are excerpts of the 2007 Archdiocesan parish finances.

10. Attached as Exhibit 6 is a chart of 2008 Archdiocesan parish finances.
11. Attached as Exhibit 6A are excerpts of the 2008 Archdiocesan parish finances.
12. Attached as Exhibit 7 is a chart of 2009 Archdiocesan parish finances.
13. Attached as Exhibit 7A are excerpts of the 2009 Archdiocesan parish finances.
14. Attached as Exhibit 8 is a chart of 2010 Archdiocesan parish finances.
15. Attached as Exhibit 8A are excerpts of the 2010 Archdiocesan parish finances.
16. Attached as Exhibit 9 is a chart of Archdiocesan parish financials 2000-2006.
17. Attached as Exhibit 10 are various Archdiocesan parish financial reports.
18. Attached as Exhibit 11 is a Catholic Cemeteries Purchase Agreement.
19. Attached as Exhibit 12A and 12B is information from the Catholic Cemeteries website.
20. Attached as Exhibits 13A-J are photos of Resurrection Catholic Cemeteries.
21. Attached as Exhibits 14A-N are photos of Calvary Catholic Cemeteries.
22. Attached as Exhibits 15A-J are photos of Gethsemane Catholic Cemeteries.
23. Attached as Exhibits 16A-I are photos of St. Mary's Catholic Cemeteries.
24. Attached as Exhibits 17A-E are photos of St. Anthony's Catholic Cemeteries.

I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Dated: May 23, 2016



Jeffrey R. Anderson